

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AUBRY MCMAHON,

Plaintiff,

vs.

WORLD VISION, INC.

Defendant.

CASE NO. 2:21-CV-00920-JLR

SECOND DECLARATION OF
SHANNON OSBORNE

Shannon Osborne declares:

1. I have personal knowledge of the facts stated in this declaration and am competent to testify to those facts.

2. I am the Director – Contact Center Operations at World Vision, Inc. (“World Vision”) and have been so employed since January 4, 2012.

3. This, my second declaration, the Second Declaration of Shannon Osborne, is denoted “SO2” herein and in the accompanying *Defendant World Vision’s Opposition to Plaintiff’s Renewed Motion for Summary Judgment (Round 2)*. This follows the same system used for all Declarations in the briefing on summary judgment. The

1 World Vision unit known as Donor Contact Services continues to be abbreviated as
2 "DCS," and DCS Representatives as "DCSRs."

3
4 4. World Vision currently has 1,009 employees, only 76 (or 7.5%) of whom
5 are part of DCS, and about 60 (or 5.9%) of whom handle inbound and outbound calls.

6 5. In January of 2021, World Vision had 898 employees, only 74 (or 8.2%)
7 of whom were DCS staff, and about 58 (or 6.5%) of whom handled such calls.

8 6. DCSRs handle nearly all inbound and most outbound calls for World
9 Vision.
10

11 7. The 9-11 weeks of formal advance training for DCSRs is more than any
12 other advance training required of other World Vision employees.

13 8. Consequently, DCSRs represent a small but vital subset of all World
14 Vision employees.
15

16
17 I am over the age of eighteen and am competent to give this Declaration. I
18 declare under penalty of perjury under the laws of the United States and the State of
19 Washington that the foregoing is true and correct.
20

21 SIGNED this 13th day of October 2023, at Seattle, Washington.

22
23 Shannon Osborne
24 SHANNON OSBORNE

25 [Separate Signature Page Attached]
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